

STATE OF MICHIGAN
62B JUDICIAL DISTRICT
17TH JUDICIAL CIRCUIT

**COMPLAINT
FELONY**

DISTRICT:
CIRCUIT:
CTN: 96-24900573-01
MSP #: *24-60116-FY*

District Court ORI: MI410085J

Circuit Court ORI: MI410025J

AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN		Defendant's name and address V BRIAN WILLIAM KEELY 2290 4 MILE RD GRAND RAPIDS, MI 49544		Victim or complainant STATE OF MICHIGAN	
Co-defendant(s) (If known)				Complaining Witness S/A PAYTRA JOHNSON	
				Date: On or about 04/17/2024	
City/Twp./Village Kent County	County in Michigan KENT	Defendant TCN	Defendant CTN 96-24900573-01	Defendant SID	
Defendant DOB Put DOB in Ref. No. row 1 on MC 97	Defendant DLN Put DLN in Ref. No. row 3 on MC 97	DLN Type:	Vehicle Type	Defendant Sex M	Defendant Race W
Police agency report no. M50	Charge See below			Maximum penalty See below	

☐ A sample for chemical testing for DNA identification profiling is on file with the Michigan State Police from a previous case.

STATE OF MICHIGAN COUNTY OF KENT

The complaining witness says that on the date and at 5260 Eastern Ave Kentwood, MI, the defendant, contrary to law,

COUNT 1: HOMICIDE - MURDER - SECOND DEGREE

did with intent to kill, to do great bodily harm, or to act in wanton and willful disregard of the likelihood that the natural tendency of said act would cause death or great bodily harm, kill *Upon one* Samuel Da Jon Cornelius Sterling, said act committed without premeditation or deliberation; contrary to MCL 750.317. [750.317] FELONY: Life or any term of years; a consecutive sentence may be imposed under MCL 769.36 for each death that resulted from operating a vehicle, vessel, ORV, snowmobile, aircraft, or locomotive; DNA to be taken upon arrest.

COUNT 2: HOMICIDE - MANSLAUGHTER - INVOLUNTARY

did cause the death of Samuel Da Jon Cornelius Sterling by committing the following act or acts in a grossly negligent manner, the apprehension of Samuel Da Jon Cornelius Sterling; contrary to MCL 750.321. [750.321-C] FELONY: 15 Years and/or \$7,500.00; DNA to be taken upon arrest; a consecutive sentence may be imposed under MCL 769.36 for each death that resulted from operating a vehicle, vessel, ORV, snowmobile, aircraft, or locomotive.

Motor Vehicle Advisory Notice: As used in this section, "felony in which a motor vehicle was used" means a felony during the commission of which the individual convicted operated a motor vehicle and while operating the vehicle presented real or potential harm to individuals or property. A violation of section 413 of the Michigan penal code, 1931 PA 328, MCL 750.413 and 750.732

Court shall order law enforcement to collect a DNA identification profiling sample before sentencing or disposition, if not taken at arrest.

The complaining witness asks that the defendant be apprehended and dealt with according to law.

Warrant authorized on 05/28/2024 by: *Oronde Patterson* P57211

Oronde Patterson (P57211)
First Assistant Attorney General
Michigan Department of Attorney General
Criminal Trials Division
3030 W. Grand Boulevard Ste 10-200
Detroit, MI 48202
313-456-0180

☐ Security for costs posted

I declare under the penalties of perjury that this complaint has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Paytra Johnson
Complaining Witness Signature

5/28/24
Date

See return on next page.

MC 200w (9/22) FELONY SET, Warrant (PACC-PAAM Replacement)

MCL 764.1 *et seq.*, MCL 766.1 *et seq.*, MCL 767.1 *et seq.*, MCR 6.102